

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

IN RE: \_\_\_\_\_ )  
                  ) )  
JOY MONIQUE MILLER         ) Case No. 17-34329-KRH  
                  ) Chapter 13  
                  Debtor )  
\_\_\_\_\_ )

**MOTION TO EXPEDITE HEARING ON MOTION  
TO INCUR DEBT AND TO SHORTEN NOTICE PERIOD**

COMES NOW the Debtor, by counsel, and moves this Court to Expedite the Hearing on her Motion to Incur Debt and to Shorten Notice Period, and in support thereof states as follows:

1. The Debtor filed this case under Chapter 13 of the U.S. Bankruptcy Code on August 29, 2017.
2. The Debtor has applied for and Credit Acceptance Corporation has approved a loan to the Debtor in the amount of \$14542.90 plus interest at 17.99% per annum to be repaid with a loan term of 57 months and monthly payments of \$382.42 for the purchase of a 2013 Ford Edge or similar vehicle.
3. The Debtor needs to purchase the referenced vehicle as her current vehicle has broken down and she needs a replacement vehicle to travel to and from work and other matters.
4. The purchase of the vehicle is in the best interest of the Debtor and will facilitate her ability to perform under her Chapter 13 Plan filed herein.
5. The Court previously entered an order granting the Debtor's Motion to Incur Debt for a loan with DriveTime. DriveTime has since withdrawn its approval of said loan.

6. The Debtor's Chapter 13 Plan has been confirmed.

WHEREFORE, the Debtor respectfully requests that the Court expedite the hearing on the Motion to Incur Debt, Shorten the Notice Period required for said Motion, grant relief from FRBP 6004(h) stay, and for such other relief as the Court may deem appropriate.

Dated: July 27, 2020

JOY MONIQUE MILLER

By: /s/ James E. Kane  
Counsel

James E. Kane (VSB #30081)  
KANE & PAPA, P.C.  
1313 East Cary Street  
Richmond, VA 23219  
(804) 225-9500 (phone)  
(804) 225-9598 (fax)  
*Counsel for Debtor*

**CERTIFICATION**

I, James E. Kane, pursuant to Local Rule 9013-1(N), do hereby certify that:

1. I have carefully examined the matter and concluded that there is a true need for an emergency hearing,
2. I have not created the emergency through any lack of due diligence.
3. I have made a *bona fide* effort to resolve the matter without hearing.

By: /s/ James E. Kane  
James E. Kane

**CERTIFICATE OF SERVICE**

I hereby certify that on July 28, 2020, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all parties registered to receive notice thereof and will mail the same by first class mail, postage pre-paid, to the parties on the attached list.

/s/ James E. Kane  
Counsel for Debtor

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

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IN RE:	)	
	)	
JOY MONIQUE MILLER	)	Case No. 17-34329-KRH
	)	Chapter 13
Debtor	)	

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**NOTICE OF MOTION AND HEARING**

The above Debtor has filed papers with the Court to request an order to Expedite the hearing and to Shorten the Notice Period with respect to the Motion to Incur Debt.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then, you or your attorney must:

- File with the court, at the address shown below, a written request for a hearing [or written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above, to:

Clerk of Court  
United States Bankruptcy Court  
701 East Broad Street  
Richmond, VA 23219

You must also mail a copy to:

James E. Kane, Esquire  
KANE & PAPA, P.C.  
1313 East Cary Street  
Richmond, Virginia 23219

- Attend a hearing scheduled for **July 29, 2020 at 12:00 a.m. at U.S. Bankruptcy Court, 701 East Broad Street, Room 5000, Richmond, VA 23219.** If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Dated: July 28, 2020

JOY MONIQUE MILLER

By: /s/ James E. Kane  
Counsel

James E. Kane (VSB #30081)  
KANE & PAPA, P.C.  
1313 East Cary Street  
Richmond, VA 23219  
(804) 225-9500 (phone)  
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/s/ James E. Kane  
Counsel for Debtor

Label Matrix for local noticing

0422-3

Case 17-34329-KRH

Eastern District of Virginia

Richmond

Fri Jun 5 15:26:47 EDT 2020

United States Bankruptcy Court  
 701 East Broad Street  
 Richmond, VA 23219-1888

Acceptance Now  
 Attn: Bankruptcy  
 5501 Headquarters Dr  
 Plano, TX 75024-5837

American Medical Collection  
 PO Box 1235  
 Elmsford, NY 10523-0935

Ashley Funding Services, LLC its successors  
 assigns as assignee of Laboratory  
 Corporation of America Holdings  
 Resurgent Capital Services  
 PO Box 10587  
 Greenville, SC 29603-0587

CAC Financial Corp.  
 2601 NW Expressway  
 Oklahoma City, OK 73112-7236

(p)CAPITAL ONE  
 PO BOX 30285  
 SALT LAKE CITY UT 84130-0285

Capital One  
 Attn: Bankruptcy  
 Po Box 30253  
 Salt Lake City, UT 84130-0253

Cardiology Associates of Richm  
 P O Box 740776  
 Cincinnati, OH 45274-0776

Cardworks/CW Nexus  
 Attn: Bankruptcy  
 Po Box 9201  
 Old Bethpage, NY 11804-9001

Commonwealth of Virginia  
 Department of Taxation  
 PO Box 2156  
 Richmond, VA 23218-2156

(p)CREDIT ADJUSTMENT BOARD INC  
 8002 DISCOVERY DRIVE  
 SUITE 311  
 RICHMOND VA 23229-8601

Credit Collection Services  
 725 Canton St.  
 Norwood, MA 02062-2679

Department Stores National Bank  
 c/o Quantum3 Group LLC  
 PO Box 657  
 Kirkland, WA 98083-0657

Fingerhut  
 6250 Ridgewood Rd  
 St Cloud, MN 56303-0820

John Randolph Med Ctr  
 P. O. Box 740760  
 Cincinnati, OH 45274-0760

John Randolph Medical Center  
 Resurgent Capital Services  
 PO Box 1927  
 Greenville, SC 29602-1927

Labcorp  
 P.O. Box 2240  
 Burlington, NC 27216-2240

Laboratory Corporation of Ameri  
 7311 Boulder View Ln  
 Richmond, VA 23225-4953

(p)LENDMARK FINANCIAL SERVICES  
 2118 USHER ST  
 COVINGTON GA 30014-2434

MERRICK BANK  
 Resurgent Capital Services  
 PO Box 10368  
 Greenville, SC 29603-0368

MIDLAND FUNDING LLC  
 PO BOX 2011  
 WARREN, MI 48090-2011

Mr. Holland

Navient  
 Attn: Bankruptcy  
 Po Box 9500  
 Wilkes-Barr, PA 18773-9500

Navient Solutions, LLC. on behalf of  
 Educational Credit Management Corporatio  
 PO BOX 16408  
 St. Paul, MN 55116-0408

Navy Federal Cr Union  
 Po Box 3000  
 Merrifield, VA 22119-3000

Navy Federal Cr Union  
 Po Box 3700  
 Merrifield, VA 22119-3700

Office of the U. S. Attorney  
 Suntrust Building  
 919 East Main Street, Suite 1900  
 Richmond, VA 23219-4622

Quantum3 Group LLC as agent for  
MOMA Funding LLC  
PO Box 788  
Kirkland, WA 98083-0788

Quantum3 Group LLC as agent for  
Sadino Funding LLC  
PO Box 788  
Kirkland, WA 98083-0788

Receivable Management Inc  
7206 Hull Street Rd Ste  
North Chesterfield, VA 23235-5826

Richard A. Cordle, Treasurer  
Chesterfield County  
P.O. Box 26585  
Richmond, VA 23261-6585

Riverview Physicians for Women  
439 Jennick Dr  
Colonial Heights, VA 23834-4901

Santander Consumer USA  
Po Box 961245  
Ft Worth, TX 76161-0244

Scolopax, LLC  
c/o Weinstein & Riley, P.S.  
2001 Western Ave, Ste 400  
Seattle, WA 98121-3132

Sleep Clinics of America Inc  
P.O. Box 35690  
Richmond, VA 23235-0690

Southside Regional Medical Cen  
P O Box 501128  
Petersburg, VA 23803-0000

(p) SPRINGLEAF FINANCIAL SERVICES  
P O BOX 3251  
EVANSVILLE IN 47731-3251

Synchrony Bank/ JC Penneys  
Po Box 965007  
Orlando, FL 32896-5007

TREASURER CHESTERFIELD COUNTY  
P.O BOX 70  
CHESTERFIELD, VA 23832-0906

The CBE Group  
Payment Processing Center  
PO Box 2193  
Waterloo, IA 50704-2193

Transworld Systems  
Collection Agency  
500 Virginia Dr., Suite 514  
Fort Washington, PA 19034-2733

US DEPARTMENT OF EDUCATION  
CLAIMS FILING UNIT  
PO BOX 8973  
MADISON, WI 53708-8973

Us Dept Of Ed/Great Lakes Higher Educati  
2401 International Lane  
Madison, WI 53704-3121

Us Dept Of Ed/Great Lakes Higher Educati  
Attn: Bankruptcy  
2401 International Lane  
Madison, WI 53704-3121

Virginia Department of Tax  
P.O. Box 2369  
Richmond, VA 23218-2369

Virginia Emergency Group  
PO Box 660627  
Mailstop: 42643574  
Dallas, TX 75266-0827

Visa Dept Store National Bank/Macy's  
Attn: Bankruptcy  
Po Box 8053  
Mason, OH 45040-8053

Wollemi Acquisitions, LLC  
AIS Portfolio Services, LP  
4515 N Santa Fe Ave. Dept. APS  
Oklahoma City, OK 73118-7901

Carl M. Bates  
341 Dial 866-813-0912 Code: 8576180  
P. O. Box 1819  
Richmond, VA 23218-1819

James E. Kane  
Kane & Papa, PC  
1313 East Cary Street  
P.O. Box 508  
Richmond, VA 23218-0508

Joy Monique Miller  
21200 Hampton Ave.  
South Chesterfield, VA 23803-2269

Judy A. Robbins  
Office of the U.S. Trustee - Region 4 -R  
701 E. Broad Street, Suite 4304  
Richmond, VA 23219-1849

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Capital One  
15000 Capital One Dr  
Richmond, VA 23238-0000

Credit Adjustment Board  
8002 DISCOVERY DR RM 311  
Richmond, VA 23229-0000

Lendmark Financial Services  
2118 Usher St  
Covington, GA 30014-0000

Portfolio Recovery Associates  
P.O. Box 12914  
Norfolk, VA 23541-0000

(d)Portfolio Recovery Associates, LLC  
POB 41067  
Norfolk VA 23541

Springleaf Financial Services  
3323 South Crater Road  
Suite A  
Petersburg, VA 23805-0000

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)Wollemi Acquisitions, LLC, c/o AIS Portfol  
4515 N Santa Fe Ave. Dept. APS  
Oklahoma City, OK 73118-7901

(d)Wollemi Acquisitions, LLC, c/o AIS Portfol  
4515 N Santa Fe Ave. Dept. APS  
Oklahoma City, OK 73118-7901

	End of Label Matrix
Mailable recipients	57
Bypassed recipients	2
Total	59